

JAP:TJS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-1374

- - - - -X

UNITED STATES OF AMERICA

- against -

AFFIDAVIT IN SUPPORT OF
REMOVAL TO THE DISTRICT
OF SOUTH CAROLINA

BISSOONDIAL RAGOONANAN and
SABRINA LUTCHMAN,

(Fed. R. Crim. P. 5(c))

Defendants.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

JOSEPH GRIMALDI, being duly sworn, deposes and says that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about September 28, 2010, arrest warrants were issued by the United States District Court for the District of South Carolina, commanding the arrest of the defendants BISSOONDIAL RAGOONANAN and SABRINA LUTCHMAN for Conspiracy Relating to Fraudulent Identification Documents, contrary to Title 18 United States Code, Section 1028(f).

The source of your deponent's information and the grounds for his belief are as follows:

1. On or about September 28, arrest warrants were issued by the United States District Court for the District of South Carolina, commanding the arrest of the defendants BISSOONDIAL RAGOONANAN and SABRINA LUTCHMAN pursuant to an indictment for Conspiracy Relating to Fraudulent Identification

Documents, contrary to Title 18 United States Code, Section 1028(f). A copy of the arrest warrants and indictment are attached hereto.

2. On or about October 18, 2010, HSI agents in the New York field office received a request from the HSI field office in Charleston, South Carolina. The request sought the arrest of individuals in connection with the attached indictment and included warrants for their arrests. Two of those individuals were the defendants BISSOONDIAL RAGOONANAN and SABRINA LUTCHMAN.


3. Agents located in South Carolina also provided pictures of RAGOONANAN and LUTCHMAN and an address at which they were likely to be located. The address provided by the South Carolina agents was 11401 134th Street, Jamaica, New York. 11401 134th Street is a house, which appears to have been divided into apartments.

4. On November 18, 2010 at approximately 6:00 a.m., agents knocked on the door of 11401 134th Street. LUTCHMAN answered the door. Agents identified themselves and followed LUTCHMAN to her apartment located on the second floor. Agents entered the department and found RAGOONANAN. Agents then asked the defendants to identify themselves. They provided their names as BISSOONDIAL RAGOONANAN and SABRINA LUTCHMAN. Agents then placed them under arrest.

5. Agents then allowed RAGOONANAN and LUTCHMAN to

retrieve identification. The identification RAGOONANO provided was a South Carolina driver's license and a photocopy of a North Carolina driver's license both in the name BISSOONDIAL RAGOONANAN. The identification that LUTCHMAN retrieved was a South Carolina driver's license with the name "Sabrina Lutcrman" and an expired Trinidadian passport in the name SABRINA LUTCHMAN. Agents further compared the photographs provided by South Carolina agents and confirmed that the defendants were the individuals sought by the District of South Carolina.

WHEREFORE, it is requested that the defendants BISSOONDIAL RAGOONANAN and SABRINA LUTCHMAN be removed to the District of South Carolina so that he may be dealt with according to law.



Joseph Grimaldi
Immigration and Customs
Enforcement

Sworn to before me this
18th day of November, 2010

GE

RECEIVED

CRIMINAL NO.: 410-938

SEP 28 2010

18 U.S.C. § 1028(f) LARRY W. PROPPS, CLERK
FLORENCE, SC

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INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

1. That from in or about February 2009, to in or about December 2009, the exact dates being unknown to the Grand Jury, the defendants, **KENNETH MITCHELL, SHERAZ MAHOMED, VERONICA RAGBIR, NICHOLAS RAGBIR, SHERWIN DURHAM, BOWLAH JAGESSAR, BISSOONDIAL RAGOONANAN, SABRINA LUTCHMAN, ANDREW ABERDEEN, and JASON CAMPBELL**, knowingly, willfully, and unlawfully did combine, conspire, confederate, and agree together and with each other:

- a. To produce identification documents in violation of Title 18, United States Code, Section 1028(a)(1);
- b. To knowingly transfer identification documents knowing that they had been produced without lawful authority in violation of Title 18, United States Code, Section 1028(a)(2);

- c. To knowingly possess with intent to use unlawfully and transfer unlawfully five or more false identification documents, in violation of Title 18, United States Code, Section 1028(a)(3);
 - d. To knowingly possess false identification documents with the intent that such document be used to defraud the United States in violation of Title 18, United States Code, Section 1028(a)(4);
2. In furtherance of the conspiracy and to affect the objects thereof, the defendants, committed, among others, the following overt acts in the District of South Carolina, and elsewhere:
- A. On or about February 26, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and a United States Virgin Islands Birth Certificate to **JASON CAMPBELL** which he then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles.
 - B. On or about August 3, 2009, **ANDREW ABERDEEN** obtained a genuine South Carolina drivers license from the Department of Motor Vehicles using a counterfeit United States Virgin Islands drivers license.
 - C. On or about September 7, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and United States Virgin Islands Birth Certificate to **SABRINA LUTCHMAN** which she then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
 - D. On or about September 10, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and United States Virgin Islands Birth Certificate to **SHERWIN DURHAM** which he then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;

- E. On or about November 30, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and United States Virgin Islands Birth Certificate to **BOWLAH JAGESSAR** which he then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
- F. On or about December 7, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and United States Virgin Islands Birth Certificate to **BISSOONDIAL RAGOONANAN** which he then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
- G. On or about December, 21, 2009, **KENNETH MITCHELL** sold a counterfeit North Carolina Birth Certificate, and a counterfeit Social Security Card to **SHERAZ MAHOMED** who then used the documents in an attempt to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
- H. On or about December 21, 2009, **KENNETH MITCHELL** sold a counterfeit United States Virgin Islands drivers license, a counterfeit United States Virgin Islands Birth Certificate and a counterfeit Social Security Card to **VERONICA RAGBIR** who then used the documents in an attempt to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
- I. On or about December 21, 2009, **KENNETH MITCHELL** sold a counterfeit United States Virgin Islands drivers license, a counterfeit United States Virgin Islands Birth Certificate, and a counterfeit Social Security Card to **NICHOLAS RAGBIR** who then used the documents in an attempt to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;

All in violation of Title 18, United States Code, Section 1028(f).

A True BILL


FOR PERSON


WILLIAM N. NETTLES (WED)
UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT

for the
District of South Carolina

United States of America
v.
BISSOONDIAL RAGOONANAN

Case No. 4:10cr938

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) BISSOONDIAL RAGOONANAN,
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Title 18, United States Code, Section 1028(f)

Date: 09/28/2010

City and state: Florence, SC



s/Sharon Welch Meyer

Deputy Clerk Issuing officer's signature

Larry W. Propes, Clerk

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

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UNITED STATES DISTRICT COURT

for the
District of South Carolina

United States of America

v.

SABRINA LUTCHMAN

Defendant

Case No. 4:10cr938-CRI

ARREST WARRANT

To: Any authorized law enforcement officer.

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s/Sharon Welch Meyer
Deputy Clerk *Issuing officer's signature*

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